

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES AND
PRODUCTS LIABILITY LITIGATION**

THIS DOCUMENT ALSO RELATES TO:

SANDRA JIMINEZ, v. JOHNSON &
JOHNSON, INC., et al.,

**MDL No.: 2738
3:16-MD-02738-FLW-LHG**

CASE NO.: 3:18-cv-12526-(FLW) (LHG)

NOTICE OF MOTION

PLEASE TAKE NOTICE, that the undersigned attorneys for Plaintiff, Sandra Jiminez, will move before the Honorable Freda L. Wolfson, U.S.D.J. on **September 17, 2018**, for an Order granting Plaintiff's Motion to Remand and to permit the amendment of Plaintiff's Complaint and would respectfully request that this case be remanded to New York State, Supreme Court, Kings County.

In support of this motion, Plaintiff shall rely upon the accompanying Brief of Daniel J. Woodard, Esq, and the exhibits annexed thereto.

PHILLIPS & PAOLICELLI, LLP

/s/ Daniel J. Woodard

By: Daniel J. Woodard, Esq.
101 Grovers Mill Road
Lawrenceville, NJ 08648
747 Third Avenue, 6th Floor
New York, NY 10017
dwoodard@p2law.com
(212) 388-5100

Date: August 23, 2018

{00039698}